

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MARTIN LUTHER KING, JR.
COUNTY, et al.,

Plaintiffs,

v.

SCOTT TURNER in his official capacity
as Secretary of the U.S. Department of
Housing and Urban Development, et al.,

Defendants.

No. 2:25-cv-00814-BJR

DECLARATION OF DOUG
WASHBURN

I, DOUG WASHBURN declare as follows:

1. I am the Kitsap County Human Services Director responsible for oversight of the operations of the department. I have been in this position with Kitsap County since June 2013 for over 12 years.

2. The Block Grant Program is funded through the Federal Department of Housing & Urban Development (HUD). Kitsap County receives an annual allocation of Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds. The amounts are determined by a formula and the federal budget. Kitsap County relies on HUD Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds to support services for low- and very low-income households. These funds are used for downpayment assistance, creation and preservation of affordable rental housing,

1 homeownership rehabilitation and weatherization, food banks, childcare and afterschool
2 programs, and microenterprise business assistance.

3 3. Kitsap County has received HUD CDBG/HOME funding since at least 1994.

4 4. The purpose of the program is to provide the community with a source of funds to
5 address a wide range of housing and community needs. The funds are used to support agencies,
6 non-profits, and governments in addressing the needs of low-income and special needs
7 households in the community. CDGB funds are primarily used to fund capital and economic
8 development projects, with a smaller portion used to fund public services. HOME funds are used
9 to fund housing projects.
10

11 5. The goal is to assist in the development of decent housing, create suitable living
12 environments and expand economic opportunities for low-income individuals and
13 families. Funding is guided by the Consolidated Plan and annual Action Plans. Grant funds are
14 awarded annually through a Coordinated Grant Application. Funding decisions are made through
15 a public process that includes review and recommendation of a Grant Recommendation
16 Committee and approval by the Board of County Commissioners.
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18 6. The Block Grant Program is funded through the Federal Department of Housing
19 & Urban Development (HUD). Kitsap County receives an annual allocation of Community
20 Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds. The
21 amounts are determined by a formula and the federal budget.
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23 7. As of 2025, Kitsap County received approximately \$1,762,147 in HUD
24 Community Development Block Grant (CDBG) and HOME Investment Partnerships Program
25 (HOME) funds—\$1,093,594 in CDBG and \$668,553 in HOME. These funds provide 100% of
26 the funding for the CDBG/Home Division within the Kitsap County Department of Human
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1 Services. All funding runs through community partner agencies and there are no direct payments
2 made to individual program participants. These funds represent approximately 2% of the overall
3 Human Services Department Budget

4 8. It is my understanding that HUD has recently issued new terms and
5 conditions for recipients of competitive grant funding.
6

7 9. If Kitsap County refuses the new HUD award conditions and federal grant
8 funding is lost, there would be a significant impact on the ability of the County to maintain the
9 development of decent housing, create suitable living environments and expand economic
10 opportunities for low-income individuals and families. These funds support critical housing and
11 community development services delivered by over ten nonprofit and governmental
12 subrecipients. Loss of funding would mean the cancellation of housing rehabilitation projects,
13 homebuyer assistance programs, childcare subsidies, and microenterprise assistance contracts.
14 Dozens of low-income households and vulnerable individuals would immediately lose services.
15 Partner organizations that rely on these funds for staffing and operations would be forced to
16 reduce services or close programs. The uncertainty alone has already disrupted on-going
17 planning activities.
18

19 10. Kitsap County Human Services is committed to equity, diversity, and inclusion.
20 Our programs are designed to serve historically marginalized populations and reduce disparities
21 in access to housing, economic opportunity, and public services. The County prioritizes services
22 that expand opportunities for low-income communities through its Consolidated Plan and
23 subrecipient selection process. This commitment is foundational—not optional—and embedded
24 throughout our departmental operations and public engagement strategies.
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26 11. To my knowledge, Kitsap County has not been provided access to, nor have we
27

1 been required to use, the SAVE (Systematic Alien Verification for Entitlements) system
2 administered by USCIS in connection with CDBG or HOME program activities.
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4 I declare under penalty of perjury under the laws of the United States and the State of
5 Washington that the foregoing is true and correct.
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7 EXECUTED this 7th day of July, 2025, at Port Orchard, Washington.
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9 *Doug Washburn*
10 DOUG WASHBURN
11 Director, Kitsap County Human Services
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CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2025, I served a true and correct copy of the foregoing document on the following parties by the method(s) indicated below:

Brian C. Kipnis Annalisa L. Cravens Sarah L. Bishop Rebecca S. Cohen <i>Assistant United States Attorneys</i> Office of the United States Attorney 700 Stewart Street, Suite 5220 Seattle, WA 98101-1271 brian.kipnis@usdoj.gov annalisa.cravens@usdoj.gov sarah.bishop@usdoj.gov rebecca.cohen@usdoj.gov <i>Attorneys for Defendants</i>	<input checked="" type="checkbox"/> CM/ECF E-service <input type="checkbox"/> Email <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Certified Mail / Return Receipt Requested <input type="checkbox"/> Hand delivery / Personal service
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I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

DATED this 14th day of July, 2025.

/s/ Gabriela DeGregorio

Gabriela DeGregorio
 Litigation Assistant
 Pacifica Law Group LLP